

# Allegheny County Health Department

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301 39th St.  
Pittsburgh, PA 15201-1891

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Director

December 16, 1996

Roger C. Westman, Ph.D.  
Air Quality Manager

(412) 578-8103

FAX: (412) 578-8144

Thomas Goettge, Plant Manager  
USS Clairton Works  
USX Corporation  
400 State Street  
Clairton, PA 15025

RE: Settlement Offer; Statement of Violations No. 961203;  
USS Clairton Works; July - September 1996

Dear Mr. Goettge:

A Statement of Violations with regard to the USX Corporation USS Division Clairton Works, 400 State St., Clairton, 15025 (USX), has been turned over to my office for appropriate enforcement action. Specifically this letter addresses the alleged violations, observed by County Inspectors and from USX reports, of various provisions of Articles XXI, Rules and Regulations of the Allegheny County Health Department, Air Pollution Control ("Article XXI"), at your company's Clairton Works during the third quarter July 1, 1996, through September 30, 1996.

This letter also constitutes an offer to settle these alleged violations, without the cost and burden of litigation, by payment of a civil penalty to the County in the amount of \$2,075 by no later than 30 days from the date of this letter.

These alleged air pollution control violations at your Allegheny County Clairton Works, including Batteries 1, 2, 3, 7, 8, 9, 13, 14, 15, 19, 20, and B, involve the following:

- Excessive visible emissions from the door areas of Battery 15 in violation of §2105.21.b of Article XXI;

Thomas Goettge  
USX Corporation  
December 16, 1996  
Page 2

- Excessive visible emissions from the pushing of coke from Battery 19 and 20 in violation of §2105.21.e.4 of Article XXI;
- Excessive visible emissions from the transport of coke from Battery 20 in violation of §2105.21.e.5 of Article XXI; and
- Excessive visible emissions from the coke oven combustion stack at Batteries B and 2 in violation of §2105.21.f.3 of Article XXI.

Summaries of the alleged violations and the basis for this settlement offer are enclosed with this letter. If USX chooses to accept this offer, a civil penalty payment in the amount of \$2,075, by check payable to the "Allegheny County Clean Air Fund", must be received by this office, to my attention at the address above, by no later than the deadline indicated above. If such penalty payment is made in accordance with this offer, the County, by this letter, hereby agrees to accept such penalty in full satisfaction of all violations alleged herein, without any final determination of law or fact, and hereby agrees to not seek any further penalties or remedial actions for such alleged violations.

The County prefers to settle alleged violations such as these rather than initiating litigation. A failure to accept this settlement offer by the deadline stated, however, will result in formal enforcement action by the County, which could include the filing of summary criminal complaints before the designated district justice.

In addition, the settlement terms acceptable to the County will increase after such deadline since additional enforcement resources will be committed to this matter.

The amount of the civil penalty payment from your company which has been offered to settle these violations in the above-referenced areas is based on the nature, severity, and frequency of the alleged violations, on the potential summary criminal penalties, upon conviction, of \$100 to \$2,500 per violation per day, and on the potential civil penalties of up to \$15,000 per violation per day (and up to \$25,000 after 7/9/96). Also considered are such things as the health effects of the pollutants

Thomas Goettge  
USX Corporation  
December 16, 1996  
Page 3

involved, the apparent willful or inadvertent nature of the violations, any potential impacts on the public, any actions taken, or being taken by your company (that have been reported to the County) to minimize the violations or to prevent future violations, the level of success of such actions, and the compliance history of the source.

Thank you for your anticipated prompt attention to this matter.

Very truly yours,



Roger C. Westman, Ph.D.  
Air Quality Manager

encl.

cc: Bruce W. Dixon, M.D.	(w/ encl.)
Stephen K. Todd	( " " )
USX Corp.	
Richard Dworek	( " " )
USX Corp.	
H. R. McCollum	( " " )
USX Corp.	
Joseph Pezze	( " " )
PA DEP, Pgh.	
Thomas J. Maslany	( " " )
US EPA Reg. III, Phil.	
William G. Gilson /	( " " )
William U. Clark	
John R. Serpa	(w/o encl.)

ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM  
USX CORPORATION - USS CLAIRTON WORKS  
Coke Plant Performance Data  
3rd Quarter (July, August, September) 1996

SUMMARY

<u>Source</u>	<u>Violations</u>					<u>Civil Penalty Settlement Offer</u>
	<u>(except as noted)</u>	<u>non-de minimis</u>				
Visible Emissions						
Charging	0	0				
Door Areas	1	1	x	\$350.00	= \$	350.00
Charging Ports	0	0				
Offtake Piping	0	0				
Pushing						
with control device 20% Opacity Std.	2	2	x	\$375.00	= \$	750.00
transport w/o control 10% Opacity Std.	1	1	x	\$375.00	= \$	375.00
Combustion Stacks						
20% Opacity Std.	2	2	x	\$300.00	= \$	600.00
60% Opacity Std.	0	0				
Pushing Control Unavailability 0.77%		0 (a)				
Coke Oven Gas Desulfurization						
Performance	4	0				
Unavailability (b)	70.1%					
Breakdown Reporting	0	0				
Flaring of Raw Coke Oven Gas	0 (c,d)	0				
Venting of Raw Coke Oven Gas	0 (c,d)	0				
Monthly & Monitoring Reports (timeliness, completeness, etc.)	0	0				
Total	10+	6				

\$2,075.00

(a) Based on individual battery unit monthly performance.

(b) Unavailability of part of the desulfurization unit may not cause an exceedance of the standard; desulfurization was in compliance 95.7% of the time (88 of 92 days).

(c) Number of battery 15-minute periods, or part thereof.

(d) Flaring: 0 battery-minutes; venting (unflared): 0 battery-minutes.

ALLEGHENY COUNTY HEALTH DEPARTMENT  
 AIR QUALITY PROGRAM  
 USX CORPORATION - USS CLAIRTON WORKS  
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 3rd Quarter (July, August, September) 1996

<u>SOURCE</u>	<u>BATTERY</u>	<u>DATE</u>	<u>OBSERVATIONS</u>
<u>Visible Emissions</u>			
Charging		NO VIOLATIONS	
Door Areas	15	08/07	6.6% leaking
Charging Ports		NO VIOLATIONS	
Offtake Piping		NO VIOLATIONS	
Pushing			
w/control device	19	09/30	12 secs. $\geq 20\%$ ( 75% max.)
20% standard	20	09/30	28 secs. 100
transport in open atmosphere	20	09/30	18 secs. $>10\%$ ( 50% max.)
10% standard			
<u>Combustion Stacks</u>			
20% standard	B	07/01	5.3 min. ( $\geq 20\%$ )
	02	07/30	16.3
60% standard		NO VIOLATIONS	

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AIR QUALITY PROGRAM  
USX CORPORATION - USS CLAIRTON WORKS  
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Pushing Control System Unavailability

<u>Battery No.</u>	<u>Uncontrolled Pushes</u>	
	<u>Month/Year</u>	<u>%</u>
1,2,3	07/96	0.20
	08/96	0.45
	09/96	0.90
7,8,9	07/96	2.71
	08/96	1.06
	09/96	0.84
13,14,15	07/96	1.57
	08/96	0.72
	09/96	0.06
19 & 20	07/96	0.64
	08/96	0.36
	09/96	0.57
B	07/96	0.00
	08/96	0.00
	09/96	0.00

Total Pushes ( 12 Batteries ): 95,100

Coke Oven Gas Desulfurization

	<u>Bat. No.</u>	<u>Date</u>
Performance	all	07/13,16,21,27
Unavailability	all	07/1-31
		08/1-30
		09/9,22-26,27

Total: 65 24-hr period(s), or  
part thereof, w/o full use of  
the desulfurization process.

Note: During the third quarter 1996, desulfurization was in compliance  
95.7% of the time on a daily basis (88 of 92 days). Unavailability  
of part of the desulfurization unit may not cause an exceedance of  
the standard.

Delayed Breakdown Reporting

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AIR QUALITY PROGRAM  
USX CORPORATION - USS CLAIRTON WORKS  
Coke Plant Performance Data  
3rd Quarter (July, August, September) 1996

Venting/Flaring of Raw Coke Oven Gas

NO VIOLATIONS

Monitoring/Monthly Reports

NO VIOLATIONS

ALLEGHENY COUNTY HEALTH DEPARTMENT  
AIR QUALITY PROGRAM  
Coke Plant Enforcement Data  
USX CORPORATION - USS CLAIRTON WORKS

3rd Quarter (July, August, September) 1996

<u>SOURCE</u>	<u>TOTAL INSPECTIONS</u>	<u>VIOLATIONS</u>	<u>COMPLIANCE</u>
CHARGING	45	0	100%
DOOR AREAS	47	1	97.9
CHARGING PORTS	48	0	100
OFFTAKES	48	0	100
PUSHING			
Pushing $\geq$ 20%	43	2	95.3
Travel > 10%	43	1	97.8
STACKS			
$\geq$ 20%	109	2	98.2
$\geq$ 60%	109	0	100

10/18/96



**ALLEGHENY COUNTY HEALTH DEPARTMENT**  
**AIR QUALITY**  
**Coke Plant Enforcement Data**  
**USX CORPORATION - CLAIRTON WORKS**  
Through the 3rd Quarter (July, August, September) 1996

